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January 20, 2005

VIA FACSIMILE
AND VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Thomas J. Krueger
Associate Regional Counsel
U.S. Environmental Protection Agency
77 West Jackson Boulevard (C-14J)
Chicago, IL 60604-3590

Re: Ellsworth Industrial Park Site (the "Site")
Downers Grove, Illinois

Dear Tom:

I am writing on behalf of Global Gear LLC in response to the Special Notice Letter dated December 28, 2004 issued by the U.S. EPA in connection with the above-referenced Site. Nothing in this letter shall be deemed an admission of any liability for hazardous substance or contaminant releases at the Site or for past and future response costs, or an acknowledgement of potentially responsible party ("PRP") status under the Comprehensive Environmental Response, Compensation and Liability Act or any other state or federal statute.

Please be advised that my firm will not be representing Global Gear LLC in the future with respect to this matter, due to a potential conflict of interest. I will notify you with new contact information after Global Gear engages new counsel for this matter.

The Special Notice Letter requests that Global Gear and the other recipients of the letter perform or finance a Remedial Investigation/Feasibility Study ("RI/FS") at the Site. While an investigation of its status as a PRP is still ongoing, Global Gear hereby notifies the U.S. EPA that it is willing to participate in further discussions with the agency and with the other Special Notice Letter recipients, and in the negotiation of an RI/FS consent order if necessary or appropriate. Assuming that a viable group of PRPs is assembled for purposes of responding to the Special Notice Letter and that adequate funding from other parties is available, Global Gear

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LLC will proceed in good faith with other members of the group in an effort to agree on a reasonable scope of work for an RI/FS. Global Gear is also interested in discussing with you the basis for the U.S. EPA's inclusion of Global Gear on the list of Special Notice Letter recipients and acquiring copies of any additional background information or data that supports the agency's decision.

Please feel free to contact me if you have any questions regarding the foregoing.

Sincerely,


Michael J. Hughes

MJH:jmo

cc: Mark D. Simanton

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